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November 21, 2024

Via ECF and Email

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corp., et al. v. Thomson Reuters Corporation, et al.*, No. 24-4269
(D.N.J.) – Motion for Reconsideration on Order Granting Motion for Remand

Dear Judge Bartle:

This firm represents defendants Thomson Reuters Corporation, Thomson Reuters Holdings, Inc., Thomson Reuters Canada Limited, and Thomson Reuters Applications, Inc., (“Thomson Reuters Defendants”) in the above-referenced matter. We write concerning the Court’s forthcoming order granting Plaintiffs’ Motion to Remand.

While the Court’s opinion cites the *first* declaration submitted by the Thomson Reuters Defendants, the Court appears not to have considered the *second* declaration submitted in connection with the Thomson Reuters Defendants’ opposition to the Motion to Remand. ECF No. 38-1. The second declaration makes clear that the website referenced in the complaint does not make available any addresses or phone numbers, that the two non-diverse defendants “do not own, operate, maintain, or control” the products that do make that information available, and that they do not “have the ability or authority to remove information” from the relevant products. *Id.*

Pursuant to 28 U.S.C. § 1447(d) and *Agostini v. Piper Aircraft Corp.*, 729 F.3d 350, 355 (3d Cir. 2013), this Court will lose jurisdiction when the Clerk’s office mails a certified copy of the remand Order to state court, which would deprive defendants of *any* opportunity to have the decision reviewed. Therefore, we respectfully request that the Court direct the Clerk’s office to refrain from transferring the case to the New Jersey state court until the Thomson Reuters Defendants have had an opportunity to review the Court’s remand Order and consider whether to seek reconsideration. We have attached a proposed Order in that

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regard, which sets a deadline for the filing of a motion for reconsideration should the Thomson Reuters Defendants believe such a motion is justified.

Thank you for your consideration of this request and please feel free to contact us with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "MB", with a long horizontal line extending to the right.

Marcel S. Pratt
Michael Berry

Enclosure

Cc: Rajiv Parikh, Counsel for Plaintiffs